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March 4, 2014

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Ms. Marlene Dortch, Secretary
Federal Communications Commission

Subject: IP Transition and rural Broadband

Dear Ms. Dortch:

We would like to express Grand County Colorado's interest in the upcoming FCC Broadband Experiments, concerning expanding universal broadband services to unserved and underserved customers in rural communities.

We understand the overall purpose of the project is to help the FCC identify how to start the process of transitioning the Public Switched Telephone Network (PSTN) to an IP based network. Obviously, our residents, business, schools and community agencies would require access to adequate broadband to subscribe to basic phone services provided over the Internet.

Based on our most recent regional broadband survey conducted in the summer of 2013, we can share with you the urgent need to improve broadband speeds in some neighborhoods currently using DSL as a broadband provider.

These neighborhoods are inside census blocks 8049000100, 201 and 202. These mountain communities are located just outside the city limits of the Towns of Fraser, Tabernash and Grand Lake Colorado. Speed tests show these DSL networks to be extremely oversubscribed, with base speeds starting at 1.7 Mb down and 1.18 Mb up. Most tests conducted in peak times in these areas report speeds near 0.5 Mb down and less than that up. Updating these DSL networks to "Metro Speed" DSL and adding additional D-Slams would immediately improve broadband access for these customers to 6Mb down and 1.5 Mb up. We believe with this simple investment, we would elevate approximately 350 – 400 households to the goal of your objectives.

Considering the amount of available CAF High-Cost funds available, we feel this would be the greatest benefit for the dollar invested at this time. Unfortunately, the areas we speak of, may have difficulty attaining CAF awards due to their proximity to better served areas inside the actual city limits of these towns. We feel Century Link has not applied for the CAF awards in the past because of this predicament.

We are stuck in a holding pattern where our local wireless providers have been hesitant to invest in these same areas because of the disruptive nature of the DSL in these neighborhoods. These small wireless businesses could be quickly displaced by a systematic upgrade to the DSL network. Hence there has been little investment in these areas.

We hope you can see how allowing some flexibility in the classification of some areas as Eligible High Cost Locations and Extremely High Cost Locations could benefit our local CLECS in accessing funding to improve broadband services in communities like ours.

It is our sincere objective to provide you with the information that would quickly and effectively improve broadband for the most number of residents as possible.

We are available to provide supporting information as needed. Please feel free to contact us as needed.

Sincerely,


Gary Bumgarner
Commissioner Chairman


Merrit Linke
Commissioner


James L. Newberry
Commissioner

GB:ke

cc: Senator Mark Udall
Senator Michael Bennet
Representative Jared Polis